

II. REMARKS

Reconsideration and allowance of the subject application are respectfully requested.

Claims 1, 4-26, 28-42, 44-52, 54-64, and 66-113 are pending in the application. Claims 1, 23, 42, 51, 56, 62, 68, 74, 79, and 85 are independent. Claims 1, 16, 19, 20, 23 to 25, 28, 30, 42, 44, 47, 48, 51, 52, 54, 56, 62, 64, 67 to 69, 72, 74, 75, 78, 79, 82 and 85 have been amended.

Applicants have added new dependent Claims 96-113 to afford themselves a scope of protection commensurate with the disclosure. The new claims are fully supported in the specification and Drawings, and are believed to be allowable for the reasons to be developed below.

Claims 1, 4-26, 28-52, 54-64, and 66-95 were rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement for the reasons discussed on pages 2-5 of the Office Action. Applicants respectfully traverse this rejection on the ground that the person of ordinary skill in the art would readily apprehend that Applicants were in possession of the claimed invention as of the application filing date. Nevertheless, solely to advance this application to issue, certain of these claims have been amended to clarify the claims with respect to the specification and Drawings, and not in response to any statutory requirement.

Claims 1, 4-26, 28-52, 54-64, and 66-95 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for the reasons discussed on page 6 of the Office Action. Applicants respectfully traverse this rejection on the ground that the

person of ordinary skill in the art would not be confused as to the meaning or scope of the claims. Nevertheless, certain of these claims have been amended for clarity with respect to the specification and Drawings, and not in response to any statutory requirement.

Claims 42, 56, 62 and 64 have been amended to overcome the objections thereto.

Claims 1, 4-26, 28-52, 54-64, and 66-95 were rejected as being unpatentable over Ishikawa, Komori, Haskin, Byrd, Saund, Kuno, and Shigehiro for the reasons discussed on pages 7-54 of the Office Action. Applicants respectfully traverse all art rejections.

The Examiner has maintained the rejection of the claims primarily on the basis of Japanese Published Application No. 09-224111 to Ishikawa either alone or in combination with Japanese Published Application No. 08-108689 to Komori, U.S. Patent No. 5,790,910 to Haskin, U.S. Patent No. 6,663,328 to Byrd et al., U.S. Patent No. 6,570,612 to Saund et al. and/or U.S. Patent No. 6,567,121 to Kuno. Applicants respectfully submit that the Examiner's rejections in view of the cited references should be removed.

The primary reference (Ishikawa) relied upon by the Examiner shows an electronic blackboard comprising an image sensor that captures images of a writing surface. Each channel of the image sensor is processed differently. The red channel of the image sensor is processed using a character discriminator, the green channel of the image sensor is processed using a straight line discriminator and the blue channel of

the image sensor is processed using an arbitrary graphics discriminator. Ishikawa thus discriminates between characters, straight lines and graphics so that they can be recognized separately and uses the level of red, green and blue colors to do this. Information input on the writing surface of the Ishikawa electronic blackboard is therefore divided into three parts, namely characters, linear lines and graphics. Colored pens are the tools used to enable the electronic blackboard to perform the above discrimination. Through use of color filters, if red (R) is the predominate color of information input on the writing surface then a character is recognized. If green (G) is the predominate color of information input on the writing surface then a linear line is recognized. If blue (B) is the predominate color of information input on the writing surface then a graphic is recognized.

The Ishikawa electronic blackboard only processes red, blue and green pen strokes on the writing surface that are made using red, blue and green pen tools. The output image of the Ishikawa electronic blackboard therefore does NOT include all pen strokes entered on the writing surface irrespective of the pen tool used to make the pen strokes or irrespective of pen stroke color. Writing on the Ishikawa electronic blackboard that is in a color other than red, blue and green is not detected by the image channel sensors, is not processed in any manner and thus, does not appear in the Ishikawa output image. Moreover, Ishikawa does not show, teach or suggest grouping output digital images according to user-defined sessions.

Independent claims 1, 23, 74 and 79 recite that the image data is processed to form output digital images of the writing surface with the output digital

images comprising ***all writing(pen strokes) entered(recorded) on the writing surface irrespective of color and that the output digital images are grouped according to user-defined (operator-defined) sessions.*** As the Examiner will appreciate from the discussion above, Ishikawa does not form an output image that includes all writing on the Ishikawa electronic blackboard irrespective of color. The output images generated by Ishikawa only include red, green and blue writing on the Ishikawa electronic blackboard. Pen strokes in any color other than red, green and blue that are visible to a human observer looking at the Ishikawa electronic blackboard are not processed and as a result do not form part of the Ishikawa output image. Also, no image grouping by session is performed by Ishikawa. Accordingly, contrary to the Examiner's allegations Ishikawa simply does not teach, suggest or disclose the Applicants' invention as defined by these claims or the claims dependent thereon.

Independent claims 42, 51, 56, 62, 68 and 85 recite that the image data is processed to form an output image of the writing surface including ***all pen strokes entered(recorded) on the writing surface irrespective of pen tool used to make the pen strokes and that the output digital images are grouped according to user-defined (operator-defined) sessions.*** Again, as the Examiner will appreciate from the discussion above, Ishikawa does not form an output image that includes all pen strokes on the Ishikawa electronic blackboard irrespective of the pen tool used to make the pen strokes. The output images generated by Ishikawa only include pen strokes entered on the Ishikawa electronic blackboard using red, green and blue pen tools. Pen strokes made using a pen tool of any other color are not processed and as a

result do not form part of the Ishikawa output image. Also, no image grouping by session is performed by Ishikawa. Accordingly, Ishikawa simply does not teach, suggest or disclose the Applicants' invention as defined by these claims or the claims dependent thereon.

The remaining references fail to overcome the deficiencies of the Ishikawa reference. None of these references teach or suggest grouping digital output images according to user-defined (operator-defined) sessions. Accordingly, the claims submitted herewith are believed to distinguish patentably over the cited prior art and should be allowed.

In view of the above amendments and remarks, it is believed that this application is now in condition for allowance, and a Notice thereof is respectfully requested. Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 625-3500. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Richard P. Bauer/
Attorney for Applicants
Richard P. Bauer
Registration No. 31,588

Patent Administrator
KATTEN MUCHIN ROSENMAN LLP
2900 K Street, N.W.
Suite 200
Washington, D.C. 20007-5118